

The Association of American Pesticide Control Officials'

Label Improvement Project

Introduction

The Label Improvement Project (Project) represents a new approach by the Board of Directors of the Association of American Pesticide Control Officials (AAPCO) when addressing issues with pesticide labels and labeling. It is based on the development of the ideal “good” label rather than reviewing “bad labels” and seeks to draw on the expertise of a wide variety of stakeholders as well as the successes of previous label initiatives to facilitate and implement permanent label improvements. The Project seeks to develop a long term, coordinated plan for achieving label improvement. Beneficiaries of the Project include pesticide applicators, registrants, federal and state/tribal/territorial regulatory officials, pesticide safety educators and other parties interested in the proper application of pesticides for the effective control of pests that adversely affect crops, structures, public health and domestic animals. AAPCO through the State FIFRA Issues, Research and Evaluation Group (SFIREG), a permanent Committee of AAPCO, is undertaking the Project.

The comprehensive Project begins with the development of the *Project Management Plan for Label Improvement* (Plan) by the Core Project Management Team (Core Team). Once completed, the Plan Implementation Team (Implementation Team) will initiate Plan activities resulting in a set of deliverables for label improvement.

The Benefits of Label Improvement

Central to the proper use of pesticides is the pesticide label. The pesticide label is a legal document. It is illegal to use a pesticide in any way other than for the purpose and in the manner stated on the label. The label provides critical information to the user about how to handle and safely use the pesticide product and avoid harm to human health and the environment. The intent of the label is to provide clear instructions on the use of pesticides.

Given the importance of the information contained on a pesticide label, numerous initiatives have been undertaken to address label/labeling issues. Select label issues which have been addressed include:

- Consistency;
- Standardization;
- Terminology/definitions;
- Advisory vs. Mandatory Statements;
- Restrictions intended to protect pollinators, water (ground and/or surface); or prevent or reduce drift; and
- Use Directions.

Other label related initiatives include:

- Training;
- Guidance documents; and
- Technological advancements.

While each initiative dedicated to label improvement has realized successes, the ability to bridge the successes of these efforts has been challenging. Utilization of a comprehensive label improvement plan will assist in maximizing those successes. The Project builds on or seeks to improve upon previous efforts or other current resources including the Label Review Manual; Office of Pesticide Program Electronic Labels (OPPEL); the State Label Issue Tracking System (SLITS) and Pesticide Registration Notices (PRN).

Pesticide users, registrants, and regulators along with pesticide safety educators realize the benefits of label improvement. As an example, clear, concise use directions would enhance the ability of users to apply the pesticide correctly. For registrants, consistency in label formatting could provide a defined template for creation of master labels and streamline the EPA review process potentially reducing the time to the registration action being completed.